

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 2008-161

**DEBORAH DARLENE HOPKINS AKA
DEBORAH DARLENE JONES**

3335 West 117th Place
Inglewood, CA 90303

Registered Nurse License No. 456937

Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, as its Decision in this matter.

This Decision shall become effective on June 12, 2008.

It is so ORDERED June 12, 2008.

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FOR THE BOARD OF REGISTERED NURSING

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
3 LINDA L. SUN, State Bar No. 207108
Deputy Attorney General
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6 Attorneys for Complainant

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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 2008-161

11 **DEBORAH DARLENE HOPKINS AKA**
12 **DEBORAH DARLENE JONES**

13 3335 West 117th Place
Inglewood, CA 90303

14 Registered Nurse License No. 456937

15 Respondent.

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
19 above-entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H, R.N. (Complainant) is the Executive Officer of
22 the Board of Registered Nursing (Board), Department of Consumer Affairs, State of California.
23 She brought this action solely in her official capacity and is represented in this matter by Edmund
24 G. Brown Jr., Attorney General of the State of California, by Linda L. Sun, Deputy Attorney
25 General.

26 2. Deborah Darlene Hopkins aka Deborah Darlene Jones (Respondent) is
27 representing herself in this proceeding and has chosen not to exercise her right to be represented
28 by counsel.

3. On or about August 31, 1990, the Board issued Registered Nurse License No. 456937 to Respondent. The Registered Nurse License was in full force and effect at all times relevant to the charges brought in Accusation No. 2008-161 and will expire on September 30, 2008, unless renewed.

JURISDICTION

4. Accusation No. 2008-161 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on November 20, 2007. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2008-161 is attached as Exhibit “A” and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 2008-161. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2008-161.

9. Respondent agrees that her Registered Nurse License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the

1 Disciplinary Order below.

2 **CONTINGENCY**

3 10. This Stipulation shall be subject to approval by the Board. Respondent
4 understands and agrees that counsel for Complainant and the staff of the Board may
5 communicate directly with the Board regarding this stipulation and settlement, without notice to
6 or participation by Respondent or her counsel. By signing the stipulation, Respondent
7 understands and agrees that she may not withdraw her agreement or seek to rescind the
8 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this
9 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of
10 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between
11 the parties, and the Board shall not be disqualified from further action by having considered this
12 matter.

13 11. The parties understand and agree that facsimile copies of this Stipulated
14 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
15 force and effect as the originals.

16 12. Respondent further stipulates that the Board has jurisdiction to impose a
17 public reprimand upon her license to practice registered nursing pursuant to section 495 of the
18 Business and Professions Code.

19 13. In consideration of the foregoing admissions and stipulations, the parties
20 agree that the Board may, without further notice or formal proceeding, issue and enter the
21 following Disciplinary Order:

22 **DISCIPLINARY ORDER**

23 11. IT IS HEREBY ORDERED THAT Registered Nurse License No. 456937
24 heretofore issued to Respondent shall, by way of letter from the Complainant, be publicly
25 reprimanded. Said letter of public reprimand will issue as set forth herein above and shall be in
26 the same form as the letter attached hereto as Exhibit "B."


27 12. In consideration for entering into this stipulated agreement ("Agreement"),
28 Respondent hereby waives any right to challenge the legal effect of this Agreement, by way of

1 petition for reconsideration, petition for writ of mandamus, appeal, or otherwise, and further
2 waives any other legal claim or defense, which she may have asserted, including, but not limited
3 to, any time based claim such as laches, in the event it is necessary to calendar an administrative
4 hearing based on any part of or all of Accusation No. 2008-161.

5 **ACCEPTANCE**

6 I have carefully read the Stipulated Settlement and Disciplinary Order. I
7 understand the stipulation and the effect it will have on my Registered Nurse License. I enter
8 into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently,
9 and agree to be bound by the Decision and Order of the Board.

10 DATED: April 4, 2008.

11 
12 DEBORAH DARLENE HOPKINS AKA
13 DEBORAH DARLENE JONES
14 Respondent

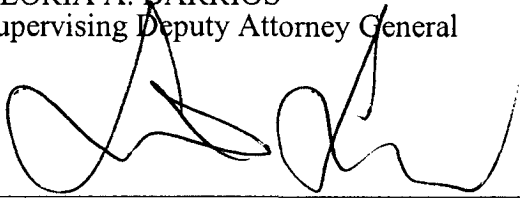
15 **ENDORSEMENT**

16 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
17 submitted for consideration by the Board.

18 DATED: 4-7-08.

19 EDMUND G. BROWN JR., Attorney General
20 of the State of California

21 GLORIA A. BARRIOS
22 Supervising Deputy Attorney General

23 
24 LINDA L. SUN
25 Deputy Attorney General

26 Attorneys for Complainant

Exhibit A
Accusation No. 2008-161

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 GLORIA A. BARRIOS, State Bar No. 94811
Supervising Deputy Attorney General
3 LINDA L. SUN, State Bar No. 207108
Deputy Attorney General
4 California Department of Justice
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-6375
6 Facsimile: (213) 897-2804

7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 DEBORAH DARLENE HOPKINS
a.k.a., DEBORAH DARLENE JONES
13 3335 West 117th Place
Inglewood, CA 90303

14 Registered Nurse License No. 456937

15 Respondent.

Case No. 2008-161

A C C U S A T I O N

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18 Complainant alleges:

19 **PARTIES**

20 1. Ruth Ann Terry, M.P.H., R.N (Complainant) brings this Accusation solely
21 in her official capacity as the Executive Officer of the Board of Registered Nursing (Board),
22 Department of Consumer Affairs.

23 2. On or about August 31, 1990, the Board issued Registered Nurse License
24 No. 456937 to Deborah Darlene Hopkins, also known as Deborah Darlene Jones (Respondent).
25 The Registered Nurse License was in full force and effect at all times relevant to the charges
26 brought herein and will expire on September 30, 2008, unless renewed.

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3. This Accusation is brought before the Board, under the authority of the

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4. Section 2750 of the Code provides, in pertinent part, that the Board may

5. Section 2764 of the Code provides, in pertinent part, that the expiration of

6. Section 2761 of the Code states:

“(a) Unprofessional conduct....”

7. Section 2762 of the Code states:

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“(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Falsified Hospital Records)**

3 11. Respondent's license is subject to disciplinary action under Code section
4 2761, subdivision (a), on the grounds of unprofessional conduct, as defined in section 2762,
5 subdivision (e), in that while on duty as a registered nurse at King/Drew, Respondent falsified,
6 made grossly incorrect, grossly inconsistent, or unintelligible entries in hospital and patient
7 records pertaining to controlled substances and dangerous drugs in the following respects:

8 a. On or about September 28, 2004, Respondent charted in the Medication
9 Administration Record and the Nursing Flowsheet ICS that she gave two extra doses of
10 Erythromycin to Patient T.B. Respondent later admitted she did not in fact administer the drug.

11 **SECOND CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct)**

13 12. Respondent's license is subject to disciplinary action under Code section
14 2761, subdivision (a), in that while on duty as a registered nurse at King/Drew, Respondent
15 committed unprofessional conduct as follows:

16 a. On or about January 25, 2004, between 1600 hours and 1700 hours,
17 medications ordered for Patient MLK#0355511 to be administered at 1000 hours that day were
18 found in the wall cabinet in the patient's room. Respondent admitted she did not administer
19 those medications to Patient MLK#0355511 at the scheduled time. Respondent also left
20 medications intended for another patient in the wall cabinet in Patient MLK#0355511's room.
21 Respondent failed to timely complete the event notification form or notify a supervisor of the
22 missing medications.

23 b. On or about September 28, 2004, Respondent charted in the Medication
24 Administration Record and the Nursing Flowsheet ICS that she gave two extra doses of
25 Erythromycin to Patient T.B. Respondent later admitted she did not in fact administer the drug.

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3. Taking such other and further action as deemed necessary and proper.

DATED: 11/14/07

LA2007600844
jz(8/7/07)



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER GOVERNOR

BOARD OF REGISTERED NURSING

P.O. Box 944210, Sacramento, CA 94244-2100

P (316) 322-3350 | www.m.ca.gov

Ruth Ann Terry, MPH, RN, Executive Officer



June 12, 2008

Deborah Darlene Hopkins
3335 West 117th Place
Inglewood, CA 90303

RE: Public Reprimand,
In the Matter of the Accusation Against:
DEBORAH DARLENE HOPKINS, a.k.a. Deborah Darlene Jones, RN License 456937
Board of Registered Nursing Case No. 2006-161

Dear Ms. Hopkins:

On November 14, 2007, the Board of Registered Nursing, Department of Consumer Affairs, State of California, filed an Accusation against your license to practice registered nursing alleging unprofessional conduct under Business and Professions Code section 2761(a) and 2762 (e), in connection with the care you provided to two patients at the Martin Luther King/Charles R. Drew Medical Center in 2004.

Taking into consideration the fact that you have been licensed by the Board since 1990 without any prior disciplinary action, that the conduct in question took place more than four years ago, that Martin Luther King/Charles R. Drew Medical Center is no longer in operation, and that there are other mitigating circumstances in this case which support the determination that you are safe to practice registered nursing, the Board has decided that the charge warrants a public reprimand.

Accordingly, pursuant to the authority provided under section 495 of the Business and Professions Code, and in resolution of this matter, the Board of Registered Nursing hereby issues this letter of public reprimand.

Sincerely,

Ruth Ann Terry MPH, RN

RUTH ANN TERRY, M.P.H., R.N.
Executive Office
Board of Registered Nursing
Department of Consumer Affairs
State of California